

Mednick, Richard

From: Liverman, Earl
Sent: Tuesday, May 28, 2013 11:24 AM
To: Terry Cundy; John Herzog
Cc: sghall@ene.com; Mednick, Richard
Subject: RE: draft interim archeological memorandum for Avery Landing



Hello,

The subject draft memorandum is confusing and offers limited assurance that the requirements to complete a cultural resource survey of the Avery Landing Site were met. The following comments are provided:

- The first portion of the CGA, Inc. archaeological memorandum (AM) appears to be a scope of work (SOW) that includes a component for cultural resource monitoring in the part of the Site that contains features related to the turntable and roundhouse, and a second component that includes discovery procedures for recording of incidental features and artifacts and a protocol for inadvertent discovery of potentially National Register of Historic Places (NRHP). Additionally, the second component refers to an archaeological monitor, while the last sentence of the Conclusions and Recommendations section of the second portion of the AM (Summary for Avery Landing Monitoring) states "Because the exploratory excavations conducted in May 2013 to further document features at the site gathered adequate information to complete the archaeological site characterization, no additional archaeological oversight for the project as it currently stands is warranted."

Clarify whether the second component applies to only the May 2013 survey or whether it also applies to the entire project. If the CGA SOW does not address the entire project, describe the procedures to be followed should concentrations of personal- or work-related artifacts be inadvertently uncovered such that these finds can be documented and assessed.

- CGE Report, Results section. The summary must provide additional detail such as the depth of the subsurface excavations and a figure showing the locations and dimensions of the excavations.
- CGE Report, Conclusions and Recommendations section, 1st sentence. The CGE report states that "on site personnel were given a verbal synopsis of what might be considered an important historical resource and possible actions to take in case of an inadvertent discovery." However, it is not clear whether this briefing applied to only the May 2013 investigation or the entire project, and whether the same field staff will be present during later excavation activities. Given the likely limited presence of personnel on-site when the briefing was presented and the likely need for additional personnel during the duration of cleanup activities, clarify how any new cleanup personnel will be made aware that the Site is also an archaeological site that has the potential to contain buried archaeological deposits, that inadvertent discovery of cultural deposits during subsurface excavation is possible and highly probable, and what procedures are to be followed if personal- or work-related artifacts are uncovered.
- CGE Report, Conclusions and Recommendations section, 3rd sentence. The CGE report mistakenly states "Based on the results of the site work, no new data exists to change the draft AAR determination that the site is eligible for the National Register of Historic Places." Applied Archaeological Research, Inc. (AAR) did not determine that the site is eligible for the National Register of Historic Places (NRHP). As stated in the Summary section (page 22) of the AAR Report No. 1095 dated 20 July 2012, "As observed, the site is not likely to meet the registration requirements for listing on the NRHP, because the information potential is low."

Thanks.

By the way, I was unable to visit the Site today (Tuesday) because of other matters, but plan to be on-Site tomorrow.

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From: John M. Herzog [<mailto:jherzog@geoengineers.com>]
Sent: Friday, May 24, 2013 5:13 PM
To: Liverman, Earl
Cc: sghall@ene.com; Terry Cundy; Abhi R. Joshi; Robert S. Trahan; John M. Herzog
Subject: draft interim archeological memorandum for Avery Landing

Earl –

Attached is the memorandum that you requested. This document summarizes the findings of the archeological pre-clear work that was completed in advance of the remedial excavation at Avery Landing.

We will keep the final report on the project open until all of the excavation work is completed. At that time, we will finalize the report and include a copy of it in the construction closeout report that will be prepared for EPA.

Please let me know if you have any questions.
See you in the field next week!

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